

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

**TITLE V DRAFT PERMIT No. V-99-034**

**R.R. DONNELLEY & SONS COMPANY**

**GLASGOW, KY.**

**June 5, 2000**

**RICK SHEWEKAH, REVIEWER**

**Plant I.D. # 105-0160-0029**

**Application Log # F458**

**SOURCE DESCRIPTION:**

The company is engaged in a commercial printing business which uses the “offset ” lithographic process. The source has ten (10) heatset lithographic presses to print magazines. All ten presses are connected with a collection plenum where the emissions are captured and controlled by 3 thermal oxidizers. The company claims a 95% destruction efficiency.

**COMMENTS:**

- Type of control and efficiency: 3 thermal oxidizers with 95% destruction efficiency
- Emission factors were used from material balance.
- 70% of the fountain solution emissions are directed to the Thermal Oxidizers.
- 20% retention of ink is assumed
- 60% of the Auto Blanket Wash solution emissions are directed to the Thermal Oxidizers.
- 50% of the Manual Blanket Wash solution stays in the rag and the other 50% goes uncontrolled.
- Applicable regulation: no applicable regulation.
- Presses # 10 and # 11 have a 53 tons of VOC per year limit, each . At the time of construction, emission credit was used to offset exceedance of the 40 tpy synthetic minor threshold.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

- Presses # 02, 03, 04, 05 and 06 have no emission limitation since no regulation is applicable.
- Press EP# 07 has a VOC emission limitation less than 36 tons per year (Synthetic Minor).
- Press EP# 08 has a VOC emission limitation less than 36 tons per year (Synthetic Minor).
- Press EP# 09 has a VOC emission limitation less than 36 tons per year (Synthetic Minor).
- Press EP# 10 has a VOC emission limitation less than 53 tons per year (Synthetic Minor).
- Press EP# 11 has a VOC emission limitation less than 53 tons per year (Synthetic Minor).

**OPERATIONAL FLEXIBILITY:**

None

**PERIODIC MONITORING:**

Monitoring devices will continuously indicate and record the combustion chamber temperature of the thermal oxidizers. The company will conduct a performance test(s) on the thermal oxidizers, which results in determining the overall efficiency of thermal oxidizers. In addition, an average temperature of each thermal oxidizer will be established during the performance test and it's very essential to monitor this temperature in order to verify compliance with the emission limitations given in the permit.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.